

BENJAMIN HEINRICH, P.C.
ATTORNEY AT LAW
189 EAST 163rd STREET
BRONX, NEW YORK 10451

E MAIL Ben@bheinrichpc.com
www.thebronxcriminallylawyer.com

TELEPHONE 718-588-4400
FAX 718-588-4716
CELL 914-552-5750

October 1, 2020

VIA ECF

Honorable Kimba M. Wood
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Sal Castro, 19 Cr. 116 (KMW)

Your Honor:

I am writing this letter requesting that the date last set by the Court for sentencing be converted to a status conference. The reason for this request is that I have been informed by Mr. Castro that he has filed a pro se motion to withdraw his guilty plea. Although I have not received an actual copy of the motion as filed, I have viewed most of what was submitted via e mail communication with my client. The arguments Mr. Castro puts forward, inartfully, are not frivolous. In fact, they are problematic for a number of reasons. I have not, as of this writing, discussed this with the government, although I have reached out and I am awaiting a call back.

I will keep the Court informed of the government's position as soon as I am told what their position on this application is.

Respectfully submitted,

Benjamin Heinrich
Benjamin Heinrich, Esq.,
Counsel for defendant-Sal Castro

cc.: AUSA Michael Kraus (ECF)